

**UNITED STATES BANKRUPTCY COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**IN RE:** Jae Young Yum

Debtor(s)

CHAPTER 13

vs.

Nationstar Mortgage LLC

Respondent

NO. 17-14599 MDC

**RESPONSE OF NATIONSTAR MORTGAGE LLC**  
**TO DEBTORS' MOTION TO REINSTATE THE STAY**

Respondent, Nationstar Mortgage LLC, by and through its counsel, KML Law Group, P.C., hereby opposes Debtors' Motion to Reinstate the Automatic Stay and assigns the following reasons therefore:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. It is unclear as to what Debtor means by "immediately thereafter", so Respondent is unable to admit or deny.
6. Denied. Respondent has not seen proof that an August payment was made.
7. It is unclear as to what Debtor means by "immediately contacted", so Respondent is unable to admit or deny.
8. Admitted that Debtor filed an Answer on November 8, 2017. With regards to the proof of two payments, the two checks attached to Debtor's motion were in the amount of \$2,636.92 each, which is less than the monthly payments owed of \$2,640.81.
9. Admitted that relief was granted on November 9, 2017.
10. Admitted that Debtor's Answer is attached as an exhibit. However, it is denied that the checks attached constitute proof of all payments, except for August, as the payments made were short the full monthly amount.
11. Admitted that Respondent has reviewed the exhibit containing the two checks. However, Respondent denies that an August payment is being held.
12. Denied, as the payments made were not full payments amount, and August's payment has not been made.

13. Denied.

14. Denied.

WHEREFORE, Respondent prays that Debtor's Motion to Reinstate the Automatic Stay be denied.

Respectfully submitted,

Date: December 11, 2017

**/s/ Rebecca A. Solarz, Esquire**

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